

EUDI Wallet Readiness Checklist for Banks

20 Questions financial institutions should be asking now

The December 24, 2026 deadline - by which all 27 EU member states must provide a certified wallet - is 6 months away. The private sector acceptance mandate follows in late 2027.

This checklist **helps banks identify gaps** before they become problems. Risk Score:

- **HIGH (15)** = regulatory exposure or significant operational failure if ignored
- **MEDIUM (5)** = meaningful gap that creates friction or delay

#	QUESTION	CATEGORY	RISK	COMPLETED
1	Has the organisation defined a position on EUDI Wallet adoption - not just as a compliance requirement, but as a customer experience and competitive opportunity?	Strategic Readiness	MEDIUM	<input type="checkbox"/>
2	Is eIDAS 2.0 alignment formally part of the bank's roadmap for 2026/2027, with ownership assigned, resources and a timeline in place?	Strategic Readiness	HIGH	<input type="checkbox"/>
3	Has the organisation identified which customer journeys - onboarding, re-verification, cross-border authentication, payments authorization - are most likely to be affected first?	Strategic Readiness	MEDIUM	<input type="checkbox"/>
4	Has the organisation made a strategic decision regarding the implementation of credential issuing components for EUDI Wallets for certain credentials, such as SCA?	Strategic Readiness	HIGH	<input type="checkbox"/>
5	Has the organisation accounted for different user journeys in its implementation, depending on whether a given wallet supports the Digital Credentials API or only OpenID for Verifiable Presentations (OID4VP)?	Customer Experience	HIGH	<input type="checkbox"/>
6	Is there a defined fallback path for customers who do not yet have an EUDI Wallet, including non-EU customers and those in markets where rollout is delayed?	Customer Experience	HIGH	<input type="checkbox"/>
7	Has the organisation assessed the impact of regulatory updates on the user journey within processes involving Strong Customer Authentication (SCA) for payment transaction authorization?	Customer Experience	HIGH	<input type="checkbox"/>
8	Is the customer-facing interface ready to handle wallet-based credential presentation, both online and in person (<i>proximity verification</i>)?	Technology & Integration	HIGH	<input type="checkbox"/>
9	Can the current identity infrastructure ingest and validate wallet-based credentials, or would this require significant re-architecture?	Technology & Integration	HIGH	<input type="checkbox"/>

10	Is the system designed to support the simultaneous presentation of multiple credentials (so-called combined presentation)?	Technology & Integration	MEDIUM	<input type="checkbox"/>
11	Has the organisation conducted a comprehensive assessment of the banking systems architecture to embed wallet-based credential services, encompassing not only customer KYC, but also payment authorization processes (SCA)?	Technology & Integration	HIGH	<input type="checkbox"/>
12	Has the organisation analyzed which elements of their data architecture and Core Banking systems will require the most extensive redefinition to support the data minimization requirement (i.e., selective disclosure) and the absence of traditional identity documents following the eIDAS 2.0 implementation, as there may be significant differences between the current and future scope of the data received?	Technology & Integration	HIGH	<input type="checkbox"/>
13	Has the organisation started adapting its systems to support reading credentials from the new eIDAS 2.0-compliant wallets?	Technology & Integration	HIGH	<input type="checkbox"/>
14	Is the organisation prepared to handle wallet credentials alongside existing methods - national eIDs, bank-based identity, biometrics, and document verification - within a single onboarding flow?	Orchestration & Fallback	MEDIUM	<input type="checkbox"/>
15	Does the architecture support intelligent routing: selecting the most appropriate identity method based on customer context, jurisdiction, assurance level, and wallet credentials availability?	Orchestration & Fallback	MEDIUM	<input type="checkbox"/>
16	Does the architecture support the case where wallet authentication fails – due to reasons such as credential expiration? Has a fallback sequence been defined for this scenario?	Orchestration & Fallback	HIGH	<input type="checkbox"/>
17	Has the compliance team assessed how wallet-based PID (Person Identification Data) maps to existing KYC and AML requirements, including standards under AMLR and EBA guidelines?	Compliance & Risk	HIGH	<input type="checkbox"/>
18	Is there a defined process for handling selective disclosure - where a customer shares only a subset of wallet attributes - and verifying that the disclosed data meets the compliance obligation?	Compliance & Risk	HIGH	<input type="checkbox"/>
19	Has the organisation assessed cross-border risk: what happens when a customer presents a credential issued by a member state different from the bank's domicile - will the bank have the technical capability to process it correctly?	Compliance & Risk	HIGH	<input type="checkbox"/>
20	Has the organisation's solution factored in potential implementation discrepancies in wallet processing (e.g., protocol differences) to guarantee interoperability and broad credential acceptance across state-issued, private, and BigTech wallets (a multi-wallet ecosystem) without a full rebuild?	Future Scalability	HIGH	<input type="checkbox"/>

How to Score Your Results

Count your **Completed** answers in each category and compare against the thresholds below:

Result	HIGH completed	MEDIUM completed
Operationally READY	13 - 15	4 - 5
In Progress - ACT NOW	9 - 12	2 - 3
Not Ready - IMMEDIATE ACTION	8 or fewer	any

If your score puts you in **"In Progress"** or **"Not Ready"** - the time to act is now.

What to Do Next

The 2027 acceptance mandate will not wait for procurement cycles.



Check your EUDI Wallet readiness.

We work with banks and financial institutions across Europe to map identity infrastructure gaps and build a path to wallet acceptance - without rebuilding your stack from scratch.



Find out more about how Authologic works.

Check how our identity orchestration platform connects EUDI Wallets, national eIDs, bank-based verification, and document checks through a single API.